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20 UNITED STATES DISTRICT COURT
21 FOR THE NORTHERN DISTRICT OF CALIFORNIA
22 SAN FRANCISCO DIVISION

23 AMERICAN FEDERATION OF
24 GOVERNMENT EMPLOYEES, AFL-CIO;
25 AMERICAN FEDERATION OF STATE
26 COUNTY AND MUNICIPAL EMPLOYEES,
27 AFL-CIO, et al.,

28 Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL
MANAGEMENT, et al.,

Defendants.

Case No. 3:25-cv-01780-WHA

**DECLARATION OF ALEXANDRA
SHULTZ**

DECLARATION OF ALEXANDRA SHULTZ

I, Alexandra Shultz, hereby declare as follows:

1. I am the Vice President of Science Policy and Government Relations for the American Geophysical Union (“AGU”), a position I have held since 2014. I make this statement based on personal knowledge and if called as a witness could and would testify competently thereto.

2. AGU is a 501(c)(3) membership association for Earth and space scientists. Founded in 1919, AGU’s mission is “to support and inspire a global community of individuals and organizations interested in advancing discovery in Earth and space sciences and its benefit for humanity and the environment.” In furtherance of this mission, AGU publishes a portfolio of 24 high-impact scholarly journals and regularly convenes meetings of scientists interested in working together on discovery and solution-based science; our 2024 annual meeting had more than 30,000 attendees. AGU is also deeply committed to inspiring and supporting the next generation of scientists to advance this mission.

3. AGU’s members are individual scientists who work in academia, government agencies, and the private sector. Many of our members are students and early-career scientists, including probationary employees in the federal government. Today, AGU has more than 42,000 dues-paying members worldwide, including 29,000 members residing in the U.S., of whom 4,380 are in California. AGU’s members in the U.S. include approximately 3,800 working in the federal government, 17,200 university researchers, and 1,040 scientists at nonprofit organizations.

4. The mass termination of probationary federal employees has already harmed AGU and its members and threatens imminent continued harm to both AGU and its members that will be severe and irreversible.

5. First, many of AGU’s members work in federal agencies across the federal government, including but not limited to the National Science Foundation (NSF), National Oceanic and Atmospheric Administration (NOAA), Department of Energy (DOE), Environmental Protection Agency (EPA), U.S. Geological Survey (USGS), U.S. Forest Service (USFS), National Aeronautics and Space Administration (NASA), Bureau of Reclamation, and Department of Agriculture (USDA). AGU members at the NSF, NOAA, DOE, EPA, USGS, and USFS have already been terminated as

1 part of the mass termination program challenged in this lawsuit, and many others face imminent job
2 loss if the mass termination program is allowed to proceed.

3 6. Second, AGU's members in the scientific community outside the federal government
4 rely significantly on federal funding to support their scientific research, including grants from the
5 NSF, DOE, USFS, EPA, NOAA, Department of Interior, U.S. Fish and Wildlife Service (FWS), and
6 Bureau of Land Management (BLM), to name a few. The loss of federal employees at these agencies
7 is likely to impair grant activities and administration, which will impair the work of these scientists
8 and undermine AGU's mission to support and further this scientific research.

9 7. Third, AGU's members both inside and outside of the federal government rely
10 significantly on the work of federal employees to support and further their own work and scientific
11 research. AGU members work closely, and often in direct collaboration, with federal agencies,
12 including but not limited to the NSF, NOAA, DOE, EPA, USGS, USFS, NASA, Bureau of
13 Reclamation, USDA, the National Institute of Environmental Health Sciences (NIEHS) (a division of
14 the National Institutes of Health (NIH)), as well as BLM, FWS, and the Centers for Disease Control
15 and Prevention (CDC).

16 8. AGU members rely on the observations and data collected and curated by these and
17 other federal agencies, which are the backbone of global science and are particularly critical for
18 protecting health and human safety. The scientific work supported by these federal agencies and
19 resources protects communities by providing critical air quality and water monitoring and data,
20 improving advance warning of flooding and tsunamis, refining forecasts of tornado and hurricane
21 paths and seismic activity, anticipating wildfire risk, and so much more. The work of these federal
22 agencies is also essential in providing the essential information for communities and the nation to be
23 prepared for and respond to climate change as well as designing solutions to the climate crisis by
24 driving innovations in energy production and the sustainable extraction of critical minerals for low
25 carbon transportation. In addition, these agencies collect data that is used to assess risks to
26 infrastructure from natural hazards, including but not limited to floods, earthquakes, avalanches,
27 volcanoes, floods, wildfires, and sea level rise. The loss of staff in these federal agencies will likely
28 reduce the availability of this data, delay and undermine the administration of federal grants,

1 impairing the ability of AGU members to conduct their research, and prevent the collaborations and
2 consultations imperative for the application of science to the public and private sector.

3 9. The termination of probationary employees at these federal agencies will have
4 significant and far-reaching harmful impacts on AGU, its members, and communities across the
5 country that depend on their work. The termination of probationary employees in the past few weeks
6 has already disrupted critical activities. For example, AGU is aware that terminations at the EPA have
7 resulted in halting work studying forest density and snowpack, the results of which are essential for
8 managing western forest water availability. AGU has also learned that terminations at NOAA last
9 week reduced the number of staff working on the agency's tsunami program, a program that requires
10 24/7 monitoring and that was already understaffed. Reduced staffing levels at already-overtaxed
11 warning centers and support offices will make tsunamis more dangerous.

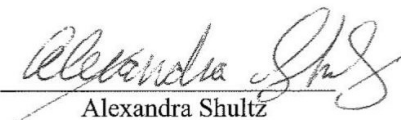
12 10. NOAA also terminated the only air quality forecaster in the Environmental Modeling
13 Center of the National Weather Service, which may cause the agency to suspend or terminate its early
14 warning system. Another AGU member terminated from NOAA was set to begin work processing a
15 backlog of over 300 applications for permits in the Florida Keys National Marine Sanctuary.
16 Termination of another AGU member, a communications specialist at NOAA Fisheries based in the
17 Monterey Bay Duty Station in California, has broken a key link in the chain of information sharing
18 between the agency and the public. And the termination of two other AGU members from the
19 USDA—both highly experienced scientists and program managers for the Data Science for Food and
20 Agricultural Systems—has created a gap in leadership and expertise within the USDA that will likely
21 slow down or halt important projects related to soil health, climate change adaptation, and sustainable
22 agricultural practices. This disruption may have far-reaching consequences for farmers, researchers,
23 and rural communities who rely on USDA-supported programs and data for decision-making and
24 innovation in the agricultural sector.

25 11. AGU's mission is to ensure that Earth and space science is robust and able to serve
26 humanity and the environment. AGU's mission is impaired by the termination of probationary
27 employees because many if not all of those employees work at the interface of science and society,
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1 and academic scientists who rely on federal agencies for funding or data will likewise lose critical
2 resources and collaborations that would be in service of AGU's mission.

3 12. The termination of federal employees will result in lost member dues and lost revenue
4 from scientists who may not be able to publish in AGU journals or attend AGU meetings. AGU has
5 also been forced to divert substantial resources away from the central work of its organization in
6 order to address the impacts to its members and scientific community as a result of these mass
7 terminations. Addressing these urgent needs has required AGU leadership and staff to abandon
8 previously planned projects and instead work around the clock to help respond to the current crisis.

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10 I declare under penalty of perjury under the laws of the United States that the foregoing is true
11 and correct. Executed this 7th day of March, 2025 in Washington, D.C.

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13 
14 Alexandra Shultz
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